

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: ZOLOFT (SERTRALINE
HYDROCHLORIDE) PRODUCTS
LIABILITY LITIGATION

THIS DOCUMENT APPLIES TO:
ALL ACTIONS

: MDL NO. 2342
: 12-MD-2342
:
: HON. CYNTHIA M. RUFÉ
:
:
:
:

PRETRIAL ORDER NO. 77

AND NOW, this 5th day of November 2014, upon consideration of the application for fees and costs incurred by Special Discovery Master Andrew Chirls for the period from July 1, 2014 through November 3, 2014 (see attached), which was submitted both to the Court and Liaison Counsel pursuant to Pretrial Order No. 22, and finding that the work, fees and costs reflected thereon are “reasonably necessary” for the fulfillment of the Special Discovery Master’s duties, and with agreement from counsel, it is hereby **ORDERED** that the application for fees and costs is **APPROVED** in full. Accordingly, the parties are responsible for payment of an equal half share of the same.

It is so **ORDERED**.

BY THE COURT:


CYNTHIA M. RUFÉ, J.



Dedicated to the Practice of Relationships

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ANDREW A. CHIRLS

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Please Reply to Philadelphia Office

November 4, 2014

The Honorable Cynthia M. Rufe
United States District Court, Eastern District of Pennsylvania
James A. Byrne U.S. Courthouse
601 Market Street, Suite 12614
Philadelphia, PA 19106-1797

**RE: In re: Zoloft (Sertraline Hydrochloride) Products Liability Litigation,
MDL No. 2342**

Dear Judge Rufe:

I am enclosing my firm's statement for services and disbursements recorded from July 1, 2014 through November 3, 2014 in connection with the above-captioned matter. I am hoping that submission and approval of the charges will not violate the stay. If the Court views the submission as appropriate, I ask that an Order be entered calling for each side to pay half.

Respectfully,

A handwritten signature in black ink, appearing to read 'A. Chirls', written over the printed name 'ANDREW A. CHIRLS'.

ANDREW A. CHIRLS

AAC/jgm

Enc.

cc: Mark S. Cheffo, Esquire (by email/.pdf)
Katherine Armstrong, esquire (by email/.pdf)
Stephen A. Corr, Esquire (by email/.pdf)
Dianne M. Nast, Esquire (by email/.pdf)
Mark P. Robinson, Jr., Esquire (by email/.pdf)

{00881608;v1}

FINEMAN KREKSTEIN & HARRIS, P.C.

BNY Mellon Center
 1735 Market Street Suite 600
 Philadelphia, PA 19103
 (215) 893-9300
 TIN 23-2176745

November 04, 2014

Parties in Zolof Multi-District Product
 Liability on Litigation

Invoice # 64571
 Client # 8864
 Billing through 11/03/2014

Re: Special Discovery Master Matters
Our File No.: 8864/00001

PROFESSIONAL SERVICES

| | | | |
|----------|-----|--|----------|
| 07/01/14 | AAC | Conference with court. | 1.60 hrs |
| 07/07/14 | AAC | Review correspondence with Court; correspond with Court. | 0.40 hrs |
| 07/08/14 | AAC | Review recent correspondence; call with Court. | 1.00 hrs |
| 08/12/14 | AAC | call w/ court; begin review of orders | 0.30 hrs |
| 08/12/14 | AAC | Call with court; begin review of Orders. | 0.30 hrs |
| 08/13/14 | AAC | review Daubert opinion re: conclusions of three experts | 0.40 hrs |
| 08/13/14 | AAC | Review Daubert opinion re: conclusions of three experts. | 0.40 hrs |
| 08/18/14 | AAC | Review Order from court. | 0.10 hrs |
| 08/20/14 | AAC | Review correspondence from court. | 0.10 hrs |
| 08/21/14 | AAC | Review order and correspondence; review recent filing by Pfizer. | 0.20 hrs |
| 08/22/14 | AAC | Review Order. | 0.10 hrs |
| 09/03/14 | AAC | Correspondence with court re: conference scheduling | 0.10 hrs |
| 09/04/14 | AAC | Review orders and agenda | 0.10 hrs |
| 09/08/14 | AAC | prepare for conference w/ court | 0.30 hrs |
| 09/10/14 | ECR | Appear and attend Leadership Conference before Judge Rufe. | 1.90 hrs |
| 09/10/14 | AAC | Meeting w/ court and parties; travel to and from meeting | 1.90 hrs |
| 09/11/14 | AAC | review order | 0.10 hrs |
| 10/06/14 | AAC | read portion of motion | 0.40 hrs |
| 10/07/14 | AAC | corr. re: scheduling of hearing | 0.20 hrs |

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|----------|----------------------------|--|-------------------|
| 8864 | U.S. District Court | Invoice# 64571 | Page 2 |
| 10/08/14 | AAC | review recent briefs and submissions; corr. re: scheduling of conference | 1.70 hrs |
| 10/09/14 | ECR | Review Plaintiff's motion to submit additional expert report. | 0.80 hrs |
| 10/09/14 | AAC | emails re: scheduling | 0.10 hrs |
| 10/10/14 | AAC | emails re: scheduling | 0.10 hrs |
| 10/14/14 | AAC | order from court; emails re: scheduling | 0.10 hrs |
| 10/21/14 | ECR | Review defendant's memorandum of law in opposition to the PSC's motion for leave to identify and present a new causation expert. | 0.70 hrs |
| 10/27/14 | AAC | Review recent submissions. | 0.50 hrs |
| 10/30/14 | AAC | review recent filing | 0.10 hrs |
| 10/31/14 | AAC | review filings | 0.30 hrs |
| 11/03/14 | AAC | Conference w/ court and parties | 2.40 hrs |
| | Chirls, Andrew | 13.30 hrs 525.00 \hr | \$6,982.50 |
| | Rosenberg, Eric C | 3.40 hrs 195.00 \hr | \$663.00 |
| | Total fees for this matter | 16.70 hrs | <u>\$7,645.50</u> |

EXPENSES

| | |
|--|----------------|
| Andrew A. Chirls; Invoice # 8864/00001; 7/1/14 Taxi to/from court | 19.00 |
| Eric Rosenberg; Invoice # 8864/00001; 9/10/14 Taxi to conference in USDC Court, Eastern District | 6.46 |
| Andrew A. Chirls; Invoice # 8864/00001; 9/10/14 Taxi to/from court | 19.00 |
| Photocopy | 31.75 |
| | <u>\$76.21</u> |

Billing Summary

| | |
|---------------------------------------|---------------------------------|
| Total Professional Services | \$7,645.50 |
| Total Expenses | +\$76.21 |
| Total of new charges for this invoice | <u>\$7,721.71</u> |
| Total Balance Now Due | <u><u>\$7,721.71</u></u> |